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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

Jan 15, 2019

SEAN F. McAVOY, CLERK

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRANDON C. CAMPBELL;

Defendants.

4:19-CR-6007-SMJ-3
INDICTMENT

Vio: 18 U.S.C. § 1594(c)
Conspiracy to Commit Sex Trafficking by
Force, Fraud, or Coercion (Count 1)

18 U.S.C. § 1591(a)(1), (b)(1)
Sex Trafficking by Force, Fraud, or
Coercion (Counts 2, 4, and 6)

18 U.S.C. § 1591(a)(2), (b)(1)
Benefitting from Sex Trafficking by Force,
Fraud, or Coercion (Counts 3, 5, and 7)

18 U.S.C. § 1591(a)(1), (b)(2)
Child Sex Trafficking (Count 8)

18 U.S.C. § 1591(a)(2), (b)(2)
Benefitting from Child Sex Trafficking
(Count 9)

18 U.S.C. § 1594
Notice of Forfeiture Allegations

1 The Grand Jury charges:

2 COUNT 1

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4 Beginning on or about April 2, 2018, and continuing until on or about May
5 29, 2018, in the Eastern District of Washington and elsewhere, the Defendants,
6 [REDACTED] BRANDON
7
8 C. CAMPBELL, confederated and agreed together and with each other, and with
9 other persons known and unknown to the Grand Jury, to knowingly, in and
10 affecting interstate and foreign commerce, recruit, entice, harbor, transport,
11
12 provide, obtain, advertise, and maintain by any means, persons, knowing and in
13 reckless disregard of the fact that force, threats of force, fraud, and coercion, as
14 defined in Title 18, United States Code, Section 1591(e)(2), and any combination
15 of such means, would be used to cause such persons to engage in commercial sex
16 acts, in violation of 18 U.S.C. § 1591(a); all in violation of 18 U.S.C. § 1594(c).
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18

19 COUNT 2

20 Beginning on or about April 2, 2018, and continuing until on or about April
21 16, 2018, in the Eastern District of Washington and elsewhere, the Defendants,
22 [REDACTED], knowingly, in
23
24 or affecting interstate commerce, recruited, harbored, transported, provided,
25
26 obtained, advertised, and maintained Victim V, knowing and in reckless disregard
27 of the fact that means of force, threats of force, fraud, and coercion would be used
28

1 to cause Victim V to engage in a commercial sex act, in violation of 18 U.S.C. §
2 1591(a)(1), (b)(1).

3
4 COUNT 3

5 Beginning on or about April 2, 2018, and continuing until on or about April
6 16, 2018, in the Eastern District of Washington and elsewhere, the Defendant,
7 [REDACTED]
8 [REDACTED] knowingly benefited, financially and by
9 receiving anything of value, from participation in a venture which had, in or
10 affecting interstate commerce, recruited, harbored, transported, provided, obtained,
11 advertised, and maintained Victim V, knowing and in reckless disregard of the fact
12 that means of force, threats of force, fraud, and coercion would be used to cause
13 Victim V to engage in a commercial sex act, in violation of 18 U.S.C. §
14 1591(a)(2), (b)(1).

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16
17 COUNT 4

18
19 Beginning in or about April 2018, and continuing until in or about May
20 2018, in the Eastern District of Washington and elsewhere, the Defendants,
21 [REDACTED]
22 [REDACTED] BRANDON C. CAMPBELL, knowingly, in
23 or affecting interstate commerce, recruited, harbored, transported, provided,
24 obtained, advertised, and maintained Victim W, knowing and in reckless disregard
25 of the fact that means of force, threats of force, fraud, and coercion would be used
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1 to cause Victim W to engage in a commercial sex act, in violation of 18 U.S.C. §
2 1591(a)(1), (b)(1).

3
4 COUNT 5

5 Beginning in or about April 2018, and continuing until or about May 2018,
6 in the Eastern District of Washington and elsewhere, the Defendant, [REDACTED]
7 [REDACTED]
8 BRANDON C. CAMPBELL, knowingly benefited,
9 financially and by receiving anything of value, from participation in a venture
10 which had, in or affecting interstate commerce, recruited, harbored, transported,
11 provided, obtained, advertised, and maintained Victim W, knowing and in reckless
12 disregard of the fact that means of force, threats of force, fraud, and coercion
13 would be used to cause Victim W to engage in a commercial sex act, in violation
14 of 18 U.S.C. § 1591(a)(2), (b)(1).
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18 COUNT 6

19 Beginning in or about April 2018, and continuing until on or about May 29,
20 2018, in the Eastern District of Washington and elsewhere, the Defendants,
21 [REDACTED]
22 BRANDON C. CAMPBELL, knowingly, in
23 or affecting interstate commerce, recruited, harbored, transported, provided,
24 obtained, advertised, and maintained Victim E, knowing and in reckless disregard
25 of the fact that means of force, threats of force, fraud, and coercion would be used
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1 to cause Victim E to engage in a commercial sex act, in violation of 18 U.S.C. §
2 1591(a)(1), (b)(1).

3
4 COUNT 7

5 Beginning in or about April 2018, and continuing until on or about May 29,
6 2018, in the Eastern District of Washington and elsewhere, the Defendant,
7 [REDACTED]
8 BRANDON C. CAMPBELL, knowingly
9 benefited, financially and by receiving anything of value, from participation in a
10 venture which had, in or affecting interstate commerce, recruited, harbored,
11 transported, provided, obtained, advertised, and maintained Victim E, knowing and
12 in reckless disregard of the fact that means of force, threats of force, fraud, and
13 coercion would be used to cause Victim E to engage in a commercial sex act, in
14 violation of 18 U.S.C. § 1591(a)(2), (b)(1).

17
18 COUNT 8

19 Beginning in or about April 2018, and continuing until on or about May 29,
20 2018, in the Eastern District of Washington and elsewhere, the Defendants,
21 [REDACTED]
22 BRANDON C. CAMPBELL, knowingly, in
23 or affecting interstate commerce, recruited, harbored, transported, provided,
24 obtained, advertised, and maintained Victim E, knowing and in reckless disregard
25 of the fact that Victim E had not attained the age of 18 years and would be caused
26 to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(1), (b)(2).

COUNT 9

Beginning in or about April 2018, and continuing until on or about May 29, 2018, in the Eastern District of Washington and elsewhere, the Defendant, [REDACTED] BRANDON C. CAMPBELL, knowingly benefited, financially and by receiving anything of value, from participation in a venture which had, in or affecting interstate commerce, recruited, harbored, transported, provided, obtained, advertised, and maintained Victim E, knowing and in reckless disregard of the fact that Victim E had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(2), (b)(2).

NOTICE OF CRIMINAL FORFEITURE

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Pursuant to 18 U.S.C. § 1594, upon conviction of an offense(s) in violation of 18 U.S.C. § 1591, as charged in Counts 1 – 9 of this Indictment, Defendants, [REDACTED] BRANDON C. CAMPBELL, shall forfeit to the United States of America (1) any property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of the offense[s], and any property traceable to such property; and (2)

1 any property, real or personal, constituting or derived from, any proceeds obtained,
2 directly or indirectly, as a result of the offense[s], and any property traceable to
3 such property. The property to be forfeited includes, but is not limited to, the
4 following:
5

6 A sum of money in U.S. currency representing the amount of
7 proceeds obtained as a result of the sex trafficking offense(s).
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10 If any of the property described above, as a result of any act or omission of
11 the defendant[s]:
12

- 13 a. cannot be located upon the exercise of due diligence;
- 14 b. has been transferred or sold to, or deposited with, a third party;
- 15 c. has been placed beyond the jurisdiction of the court;
- 16 d. has been substantially diminished in value; or
- 17 e. has been commingled with other property which cannot be
18 divided without difficulty,
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1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).
3

4 DATED this 15th day of January, 2019.
5

6 A TRUE BILL
7

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9 _____
10 Foreperson

11 Joseph H. Harrington
12 United States Attorney
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14 _____
15 Thomas J. Hanlon
16 Supervisory Assistant United States Attorney
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18 _____
19 Meghan M. McCalla
20 Assistant United States Attorney
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